

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

ELLIOT SIEGAL,

Plaintiff,

—against—

YAAKOV MILSTEIN, AVROHOM Y. SOROTZKIN
and J. SYNERGY GREEN, INC.,

Defendants.

Case No: 2:21-cv-04032-JS-SIL

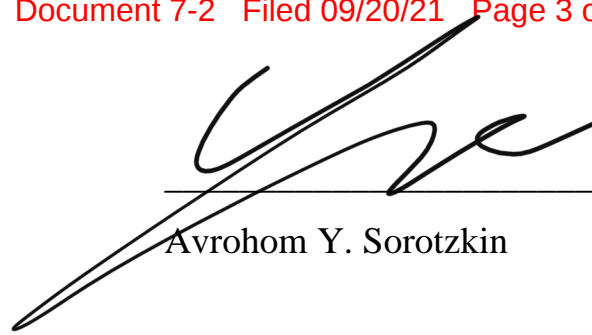
**DECLARATION IN
SUPPORT OF MOTION
TO COMPEL**

The undersigned, Avrohom Y. Sorotzkin, hereby declares and affirms under penalty of perjury the following:

1. I am one of the defendants in the instant litigation and a corporate officer of J. Synergy Green, Inc. I am fully familiar with this proceeding and facts and circumstances surrounding it.
2. This declaration is made in support of the motion to compel arbitration or in the alternative to dismiss this action for lack of subject matter.
3. I along with the other defendants are being sued by the plaintiff for alleged labor law violations along with breach of contract claims. However, as plaintiff knows full well, there was an agreement to arbitrate any disputes arising out of our business relationship and this matter should be resolved pursuant to the agreement to arbitrate. My attorney asked me to produce documentation of the agreement to arbitrate any disputes arising from our business arrangement; and I was able to provide him the necessary documentation that is being used as exhibits in this motion to compel arbitration.
4. In reviewing all the documentation that I have as it relates to having any

disputes settled before an arbitration board, I was able to provide a copy of the arbitration agreement (in both English and Hebrew), of which a true and correct copy is annexed as Exhibit A, emails relating to the arbitration process, of which true and correct copies are annexed as Exhibit B, text messages relating to the arbitration process, of which true and correct copies are annexed as Exhibit C, and a summons and complaint issued regarding the arbitration process. I understand that these documents that I provided make up exhibits attached to this motion to compel arbitration. I have reviewed the attached exhibits and they are a true and accurate representation of the documents in my possession. These records not only show that an arbitration process was agreed upon but that process of arbitration had begun; and this arbitration process should be allowed to proceed as that is what the parties had agreed upon to happen if any disputes arose amongst us.

5. I have reviewed all my records as to this matter, both electronic and in writing; and I do not have any records in my possession that would contradict the records submitted in support of this motion to compel arbitration. The record is simple, the parties contracted to have matters like this settled by arbitration and this contractual relationship should not be disturbed by this Court.
6. I respectfully request that this Court grant the request to compel arbitration or in the alternative to dismiss this action for lack of subject matter jurisdiction.



A handwritten signature in black ink, consisting of a large, stylized 'A' followed by a series of loops and a long horizontal stroke extending to the right. The signature is written over a horizontal line.

Avrohom Y. Sorotzkin

Date: _Sept 20, 2021_